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Affiliations appear only for purposes of identification.

December 22, 2021

Honorable Judge Katherine Polk Failla United States District Judge U.S. District Court for the Southern District of New York 40 Foley Square New York, New York 1000

VIA ECF

Re: Application of the Reporters Committee for Freedom of the Press to Unseal Certain Search Warrant Applications and Related Judicial Documents (18-mc-0320 (KPF))

Dear Judge Failla:

Petitioner Reporters Committee for Freedom of the Press ("Reporters Committee") and the U.S. Attorney's Office for the Southern District of New York ("USAO") write in response to the Court's order dated September 28, 2021 (Docket No. 42), directing the submission of a joint status letter regarding the above-captioned case, which was stayed through December 17, 2021.

Since the Court's order, the Government has continued its regular discussions with the Clerk's Office regarding electronic filing of sealed applications and orders, including providing comments to the test version of the electronic filing system, as previously discussed in updates to the Court. The Clerk's Office is still in the process of incorporating those comments and testing the system. The parties are hopeful they will be able to update the Court by the end of January as to the timing of the initial rollout of the electronic filing system.

Accordingly, the parties respectfully request that the stay in this case be extended until January 31, 2022. The parties will provide a further status update to the Court on or before January 31, 2022, to advise the Court of any developments and/or to seek additional time to continue our discussions and to develop, in coordination with the Clerk's Office, any recommended procedures to resolve the pending litigation.

Respectfully submitted,

/s/ Katie Townsend

Katie Townsend ktownsend@rcfp.org REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS 1156 15th Street NW, Suite 1020 Washington, D.C. 20005 202.795.9300

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By: /s/ Janis Echenberg Janis Echenberg Assistant United States Attorney (212) 637-2597